

LITTLER MENDELSON

A Professional Corporation

Attorneys for Defendants

Thomas Hanka, Sharon Linari and Tristar Title, LLC

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MELISSA and KELVIN ALMANZAR,

No. 07 CIV 3894 (LTS) (HBP)

Plaintiffs,

-against-

**ANSWER TO THE
SUPPLEMENT TO COMPLAINT**

THOMAS HANKA, SHARON LINARI, TRISTAR
TITLE, LLC and TRISTAR TITLE AGENCY, LLC,

Defendants.

Defendant Thomas Hanka (“Defendant”), by and through his attorney, Littler Mendelson, P.C., hereby answer the Supplement to Complaint of Melissa Almanzar and Kelvin Almanzar (“Plaintiffs”) as follows:

1. Defendant denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the Supplement to Complaint.
2. Defendant denies the allegations contained in paragraph 2 of the Complaint.
3. Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 3 of the Supplement to Complaint.
4. Defendant denies the allegations contained in paragraph 4 of the Supplement to Complaint.
5. Defendant admits the allegations contained in paragraph 5 of the Supplement to Complaint.

6. Defendant denies the allegations contained in paragraph 6 of the Supplement to Complaint.

7. Defendant admits that defendants Thomas Hanka and Tristar Title, LLC are not citizens of the State of New Jersey, but lack knowledge or information sufficient to form a belief as to the citizenship of Sharon Linari.

8. Defendant admits that Plaintiffs were employed in the State of New York, county of New York and that the alleged acts of discrimination purportedly took place in said state and county, but deny that any discriminatory acts actually occurred.

9. Defendant admits that the amount in controversy exceeds \$100,000 but denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 9 of the Supplement to Complaint.

Date: October 1, 2007

LITTLER MENDELSON, P.C.

Attorneys for Defendants
Thomas Hanka, Sharon Linari and Tristar Title,
LLC

By: /s/ Jeannine R. Idrissa
Jeannine R. Idrissa

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Plaintiffs,

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-against-

THOMAS HANKA, SHARON LINARI,
TRISTAR TITLE, LLC and TRISTAR TITLE
AGENCY, LLC

CERTIFICATE OF SERVICE

Electronically Filed

Defendants.

Jeannine Idrissa, of full age, hereby certifies as follows:

1. I am an attorney with the firm of Littler Mendelson, P.C., counsel for Defendants Tristar Title, LLC, Thomas Hanka, and Sharon Linari, an individual, in the above-captioned action. I am familiar with the facts set forth in this Certification.

2. On October 1, 2007, I caused a true and complete copy of Defendant Thomas Hanka's Answer to the Supplement to Complaint to be electronically filed with the Clerk of the District Court using the CM/ECF systems, which sent notification of such filing to the following:

Derek T. Smith (DTS 1747)
Akin & Smith, LLC
Attorneys for Plaintiffs
305 Broadway, Suite 1101
New York, NY 10007
(212) 587-0760

3. I certify that the foregoing statements made by me are true. I understand that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Jeannine R. Idrissa

Jeannine R. Idrissa

Dated: October 1, 2007

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